Before the FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

CC Docket No. 99-200

Number Resource Optimization

In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996.

CC Docket No. 96-98

COMMENTS OF THE PUBLIC UTILITIES COMMISSION OF OHIO

On May 4, 2005, the Federal Communications Commission (FCC) released a public notice (notice) in CC Docket Nos. 99-200 and 96-98 inviting public input regarding the petitions filed by the Missouri Public Service Commission (Missouri) and the Michigan Public Service Commission (Michigan) for authority to implement additional numbering resource optimization measures. Comments responding to the FCC's notice are due on June 4, 2005.

The Public Utilities Commission of Ohio (Ohio Commission) asks that the attached comments filed on November 29, 2004 in docket 99-200 responding to the Oklahoma Corporation Commission's petition for delegated authority to implement additional number conservation measures be incorporated by reference as the Ohio Commission's comments in response to the Missouri and Michigan petitions. The comments previously filed by the Ohio Commission in response to the Oklahoma Corporation Commission's petition, among other things, noted that allowing states to mandate pooling in local number portability-capable rate centers outside of the

Ohio Commission Comments CC Docket No. 99-200 May 31, 2005

Page 2 of 2

top 100 MSAs will delay the need for area code relief by more efficiently utilizing

the numbering resources. The Ohio Commission respectfully requests that the

attached, previously filed comments be docketed in this proceeding and considered

responsive to the May 4, 2005 notice.

The Ohio Commission thanks the FCC for the opportunity to comment in this

proceeding.

Respectfully submitted,

Jim Petro

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